

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA**

**V.**

**TRANQUILINO LEON-VASQUEZ**

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**CRIMINAL NUMBER 22-110-1**

**ORDER**

**AND NOW**, this            day of            , 2022, upon consideration of the Defendant's Unopposed Motion for Continuance of Trial, it is hereby **ORDERED** that the motion is **GRANTED**. The Court finds that the parties need additional time to determine whether a non-trial disposition can be negotiated and if not, the defense needs more time to prepare for trial. Pursuant to 18 U.S.C. § 3161(h)(7)(A), the Court finds that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Trial in this matter shall begin on the            day of            , 2022.

BY THE COURT:

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THE HONORABLE WENDY BEETLESTONE  
United States District Court Judge

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**CRIMINAL NUMBER 22-110-1**

**DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL**

Tranquilino Leon-Vasquez, by and through his attorney, Andrew C. Moon, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, respectfully requests a continuance of trial for the above captioned case. As grounds, counsel avers as follows in support of his motion to continue trial for a minimum of ninety (90) days:

1. On April 12, 2022, Mr. Leon-Vasquez was arraigned before The Honorable Lynne A. Sitarski and entered a plea of not guilty to the instant indictment.
2. The trial is scheduled to begin on September 19, 2022.
3. Defense counsel needs additional time to review the discovery materials with Mr. Leon-Vasquez, conduct necessary investigation and legal research, determine if a non-trial disposition is possible, and otherwise prepare for trial. A continuance of not less than ninety (90) days is respectfully requested.
4. Assistant United States Attorney Christopher John Mannion has no objection to this continuance motion.
5. Defense counsel stipulates that the time from the filing of this motion until the trial date is excludable time pursuant to 18 U.S.C. § 3161(h)(7)(A).

6. Counsel undersigned reviewed Mr. Leon-Vasquez's speedy trial rights with him and he verbally consented to a continuance.

**WHEREFORE**, for the foregoing reasons, the defense respectfully requests that this motion be granted.

Respectfully submitted,

/s/ Andrew C. Moon  
ANDREW C. MOON  
Assistant Federal Defender

**CERTIFICATE OF SERVICE**

I, Andrew C. Moon, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I have electronically filed and served a copy of the Defendant's Unopposed Motion for Continuance of Trial, by electronic notification and/or hand delivery to his office, upon Christopher John Mannion, Assistant United States Attorney, office located at 615 Chestnut Street, Suite 1250, Philadelphia, Pennsylvania 19106, via his email address [Christopher.Mannion@usdoj.gov](mailto:Christopher.Mannion@usdoj.gov).

/s/ Andrew C. Moon  
ANDREW C. MOON  
Assistant Federal Defender

DATE: August 17, 2022